# UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE GREENEVILLE



UNITED STATES OF AMERICA	)	Clerk, U. S. District Court Eastern District of Tennessee
V.	)	No. 2:23-CR-
	)	JUDGE Green
SEAN WILLIAMS	)	

## **INDICTMENT**

### COUNT ONE

The Grand Jury charges that on or about January 20, 2009 in the Eastern District of Tennessee and elsewhere, the defendant, SEAN WILLIAMS, did knowingly employ, use, persuade, induce, entice, or coerce a minor, namely, K.C. or knowingly attempted to employ, use, persuade, induce, entice, or coerce, a minor, namely, K.C. to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and SEAN WILLIAMS, knew or had reason to know that such visual depictions would have been transported or transmitted using a means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or that such visual depictions were produced using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer, or such visual depictions had actually been transported or transmitted using a means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce.

[18 U.S.C. § 2251(a) and (e)]

#### COUNT TWO

The Grand Jury further charges that on or about May 20, 2020 in the Eastern District of Tennessee and elsewhere, the defendant, SEAN WILLIAMS, did knowingly employ, use,

persuade, induce, entice, or coerce a minor, namely, W.S. or knowingly attempted to employ, use, persuade, induce, entice, or coerce, a minor, namely, W.S. to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and SEAN WILLIAMS, knew or had reason to know that such visual depictions would have been transported or transmitted using a means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or that such visual depictions were produced using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer, or such visual depictions had actually been transported or transmitted using a means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce.

[18 U.S.C. § 2251(a) and (e)]

#### **COUNT THREE**

The Grand Jury further charges that on or about December 23, 2020 in the Eastern

District of Tennessee and elsewhere, the defendant, SEAN WILLIAMS, did knowingly employ, use, persuade, induce, entice, or coerce a minor, namely, C.A. or knowingly attempted to employ, use, persuade, induce, entice, or coerce, a minor, namely, C.A. to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and SEAN WILLIAMS, knew or had reason to know that such visual depictions would have been transported or transmitted using a means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or that such visual depictions were produced using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer, or such visual depictions had actually been transported or transmitted using a means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or in or affecting interstate or foreign commerce.

A TRUE BILL:

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FRANCIS M. HAMILTON III UNITED STATES ATTORNEY

BY:

MEGHAN L. GOMEZ

Assistant United States Attorney